
31 October 2022

Modern Slavery Statement FY22

St Barbara Limited (ASX: SBM) ("**Company**") has submitted earlier today its Modern Slavery Statement ("**Statement**") to the Australian Government's Online Register for Modern Slavery Statements. The Company's Statement is made pursuant to the Modern Slavery Act 2018 (Cth) for the financial year ended 30 June 2022.

Authorised by

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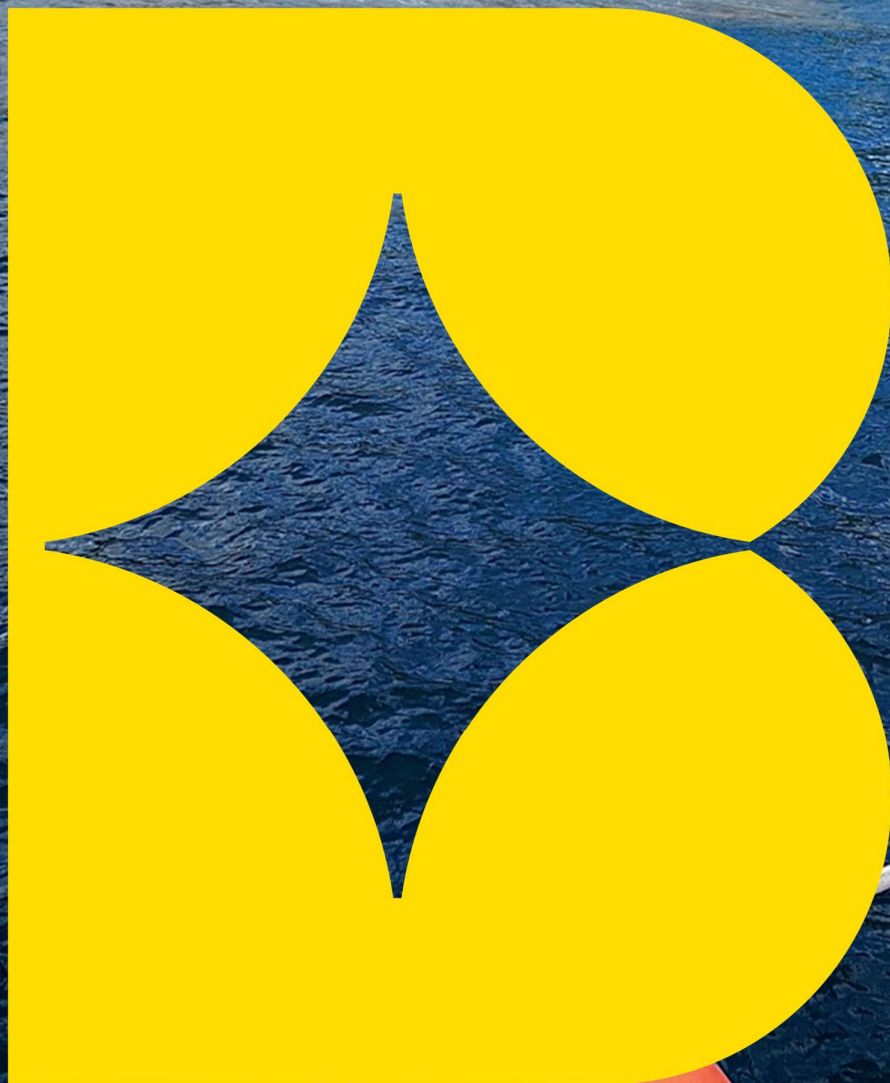
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Modern Slavery Statement FY22

25 October 2022




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We are St Barbara


A growing gold company with a global outlook. We are here to create value in everything we do for our people, our communities and our shareholders. As we strive towards our vision to be a brilliant, global mining company that grows sustainably and creates enduring, positive impacts, we are guided every day by our five commitments and values-led culture. At St Barbara, doing the right thing genuinely matters to all of us.


Our commitments

**Safety Always**

**Empowered People, Diverse Teams**

**Stronger Communities**

**Respecting the Environment**

**Growing Sustainably**

Our values

Our values guide us in our decision-making every day.

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better

We at St Barbara acknowledge the First Nations' people of the ancestral lands on which we operate in Australia, Canada and Papua New Guinea. We pay our respects to all First Nation people, and to Elders past, present, and emerging.

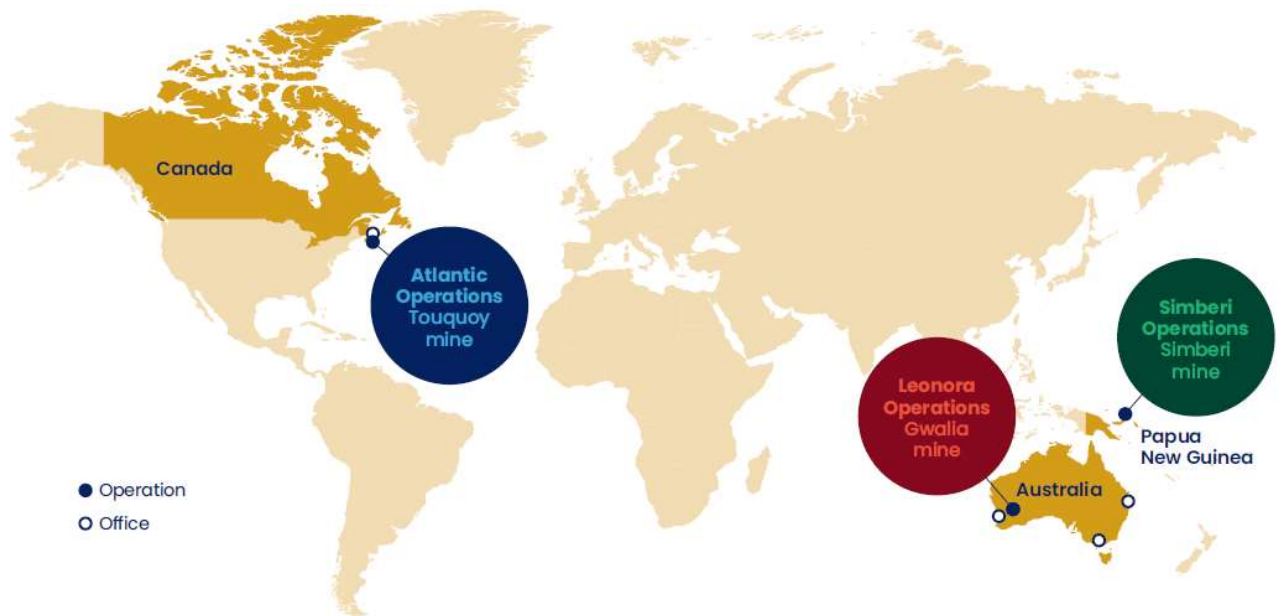
We recognise the unique cultural heritage, beliefs and connection to these lands, waters and communities held by First Nations' people. We also recognise the importance of the continued protection and preservation of cultural, spiritual and educational practices.

St Barbara Limited ABN 36 009 165 066 Building Brilliance®, Brilliance matters®, and  are registered trademarks of St Barbara Limited and/or its affiliates.

Our company

We are an Australian based, ASX listed gold mining company. Our assets include our Leonora Operations in Western Australia, our Atlantic Operations in Nova Scotia, Canada and our Simberi Operations in New Ireland Province, Papua New Guinea.

Our assets



Leonora Operations processing plant

Introduction

This Modern Slavery Statement (Statement) is made pursuant to the Modern Slavery Act 2018 (Cth) by St Barbara Limited, for the financial year ended 30 June 2022 (FY22).



The Board and Management of St Barbara are committed to continually improving our processes and practices to support the elimination of modern slavery within our global operations and supply chains. We updated our grievance and escalation process and encourage everyone to speak up and play their role in combatting modern slavery.

Our five Company values sit at the heart of our approach to addressing modern slavery risks. These values ensure we act with honesty and integrity, treat people with respect, work together, deliver on our promises and strive to do better.

We also have a set of Company commitments. Our strong, values-led culture drives our behaviour and guides our decision-making every day as we deliver on our commitments.

During the FY22 reporting period we continued to advance our progress in our Modern Slavery journey. We continue to utilise due diligence systems to identify and investigate any high-risk suppliers. We also updated our Modern Slavery Policy, held targeted training

workshops, undertook deep dives, and engaged with external stakeholders to share learnings.

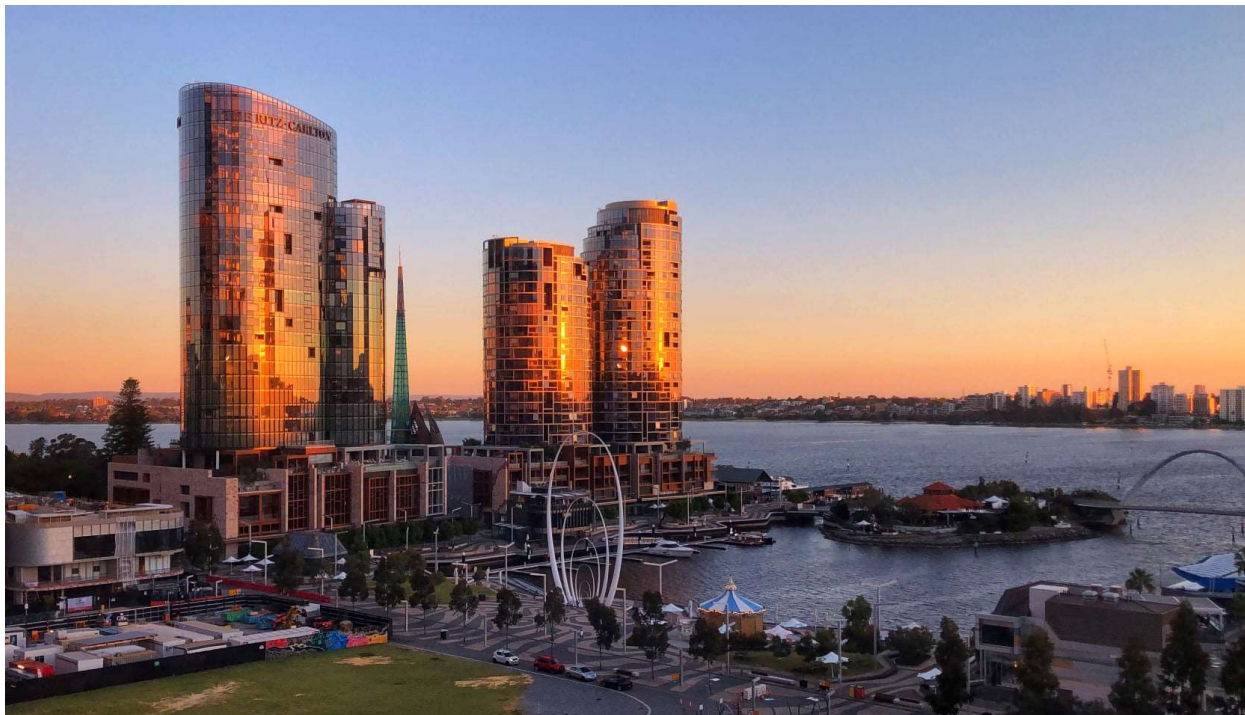
We assessed our group-wide Modern Slavery risks. As a result we continued our focus on our PNG operation including a closer look at our small businesses and shipping supply chain and worked with suppliers to improve contract compliance.

This statement has been endorsed by the Safety and Sustainability Committee and approved by St Barbara Limited's Board of Directors on 25 October 2022.

A handwritten signature in black ink, appearing to read 'C. Jetson'.

Craig Jetson

Managing Director and CEO 25 October 2022



View from Perth office

Our structure, operations and supply chains

St Barbara has gold mining operations located in Australia, Canada and Papua New Guinea (PNG). The St Barbara Group comprises sixteen corporate entities with over 1300 employees.

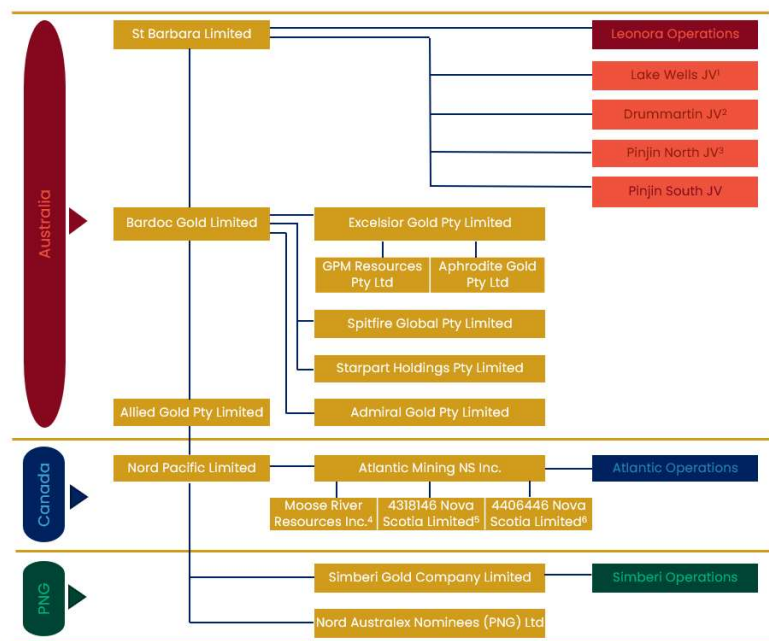
Our structure

St Barbara Limited (ACN 009 165 066) is a publicly listed company on the Australian Securities Exchange (ASX) and is headquartered in Perth, Western Australia with an office in Melbourne, Victoria and a warehouse in Lytton, Queensland.

As illustrated in the diagram below, as at 30 June 2022, St Barbara Limited was the ultimate holding company of the following wholly-owned subsidiaries across Australia, Canada and Papua New Guinea:

- Allied Gold Pty Limited, non-operating company registered in Australia.
- Bardoc Gold Limited, operating company registered in Australia.
- Excelsior Gold Pty Ltd, non-operating company registered in Australia.
- GPM Resources Pty Ltd, an operating company registered in Australia.
- Aphrodite Gold Pty Ltd, an operating company registered in Australia.
- Admiral Gold Pty Ltd, non-operating company registered in Australia.

- Spitfire Global Pty Ltd, non-operating company registered in Australia.
- Starpart Holdings Pty Ltd, non-operating company registered in Australia.
- Nord Pacific Limited, non-operating company registered in New Brunswick, Canada.
- Atlantic Mining NS Inc., operating company registered in Nova Scotia, Canada.
- Moose River Resources Incorporated, non-operating company registered in Nova Scotia Canada.
- 4318146 Nova Scotia Limited, non-operating company registered in Nova Scotia Canada.
- 4406446 Nova Scotia Limited (formerly MGNS 1858 Corporation), non-operating company registered in Nova Scotia Canada.
- Nord Australex Nominees (PNG) Limited, non-operating company registered in Papua New Guinea.
- Simberi Gold Company Limited, operating company registered in Papua New Guinea.



^[1] Company withdrew from Lake Wells JV, as at 12 August 2022.

^[2] Company withdrew from Drummartin JV, as at 23 June 2022.

^[3] Company withdrew from Pinjin North JV, as at 19 September 2022.

^[4] Amalgamated into Atlantic Mining NS Inc. as at 1 July 2022.

^[5] Amalgamated into Atlantic Mining NS Inc. as at 1 July 2022.

^[6] Amalgamated into Atlantic Mining NS Inc. as at 1 July 2022.

Our structure, operations and supply chains continued

Our operations

St Barbara's operations include three operating gold mines, exploration activities, rights to acquire interests in operated and non-operated joint ventures, and equity investments. In FY22, we toll processed third party ore at our Leonora Operations. We own and operate the following three gold mining operations:

- Atlantic Operations, includes the Touquoy open pit gold mine and three additional planned pits nearby at Beaver Dam, Cochrane Hill and Fifteen Mile Stream. These operations are located approximately 80km northeast of Halifax, Nova Scotia in Canada.
- Leonora Operations includes the Gwalia 1.4 Mtpa processing plant and the Gwalia underground gold mine. The Gwalia underground mine is located 235km from Kalgoorlie, Western Australia.
- Simberi Operations, is an open cut gold mine situated on Simberi Island, the northernmost island in the Tabar group of islands in the Province of New Ireland – the eastern most Province of PNG and approximately 1,000km north of Port Moresby.

In April 2022, St Barbara acquired a 100% interest in Bardoc Gold Limited (Bardoc). Bardoc's main asset is the Bardoc Gold Project, a gold development project located in the Eastern Goldfields region of Western Australia.

We also conduct exploration activities globally, with exploration teams based at the Gwalia mine (Western Australia), Touquoy mine (Canada), Simberi mine (PNG) and Perth for regional projects in Australia. These regional projects include Pinjin and Lake Wells (Western Australia), Back Creek (New South Wales), and Drummartin (Victoria).

Our operated and non-operated exploration joint ventures are:

- Drummartin Joint Venture – St Barbara entered into an Earn-in and Joint Venture Agreement with Catalyst Metals Limited and Kite Operations Pty Ltd dated 23 November 2019 in respect of the Drummartin Project located approximately 60km north of the Fosterville Gold Mine in Fosterville, Victoria. Under this agreement,

we have a right to acquire a 50% participating interest. As at 30 June 2021, we have not exercised our right to acquire our participating interest and do not have operational control of this joint venture. St Barbara has been appointed as manager of this joint venture during the earn-in period.

- Lake Wells Joint Venture – St Barbara entered into an Earn-in and Joint Venture Agreement with Australian Potash Limited on 7 October 2018 in respect of the Lake Wells Project located approximately 150km north-east of Laverton, Western Australia. We have operational control of this joint venture. Under this agreement, we had a right to acquire a 70% participating interest, which was exercised in March 2021. St Barbara is the appointed manager of this joint venture.
- Pinjin North Joint Venture – St Barbara entered into a Farm-in and Joint Venture Agreement with E79 Gold Mines Limited on 23 March 2021 in respect of the Pinjin North Project, in Western Australia. In FY22, E79 Gold Mines Limited exercised its right to hold an 80% participating interest. We did not manage nor have operational control of this joint venture. In FY23, E79 Gold Mines Limited acquired a 100% interest in the Pinjin North Project.
- Pinjin South Earn-In and Joint Venture – St Barbara entered into an Earn-in and Joint Venture Agreement with Plowden Resources Pty Ltd on 24 December 2021 in respect of the Pinjin South Project, in Western Australia. Under this agreement, Plowden Resources Pty Ltd will have the right to acquire up to a 70% participating interest. We do not manage nor have operational control of this joint venture. As at 30 June 2022, Plowden Resources Pty Ltd has not exercised its right to acquire a participating interest.

In FY22, St Barbara had minority equity investments in the following companies listed on the ASX:

- Catalyst Metals Limited (CYL)
- Duketon Mining Limited (DKM)¹
- Peel Mining Limited (PEX)
- Kin Mining NL (KIN)



Bardoc early works

^[1] Company divested Duketon, as at 27 July 2022.

Our structure, operations and supply chains continued

Snapshot of our workforce

As at 30 June 2022, our workforce comprised 2,264 employees as well as supporting contractor personnel. The employee and contractor breakdown for each country that we operate in is as follows:

Employee and contractor numbers		FY22
Australia	Employees	274
	Contractors	429
	Total	703
Canada	Employees	322
	Contractors	5
	Total	327
Papua New Guinea	Employees	742
	Contractors	491
	Total	1,233
Total	Employees	1,339
	Contractors	925
	Total	2,264

Proportion of women employed		FY22
Australia		26%
Canada		21%
Papua New Guinea		16%
% Women in entire workforce		19%
		2,264

At the Atlantic Operations, all of our employees reside within the Halifax Regional Municipality and surrounding area.

At the Leonora Operations, 6% of our current employee base is from the local area. The small local community has relatively few people in the highly skilled categories typically required for underground mining. In Western Australia 'FIFO' (fly-in, fly-out) labour is the prevalent employment model in the resources industry.

Our employees in Canada and Australia perform a range of roles from mining engineers, geologists, technicians, plant operators, truck drivers, accountants, administrators and other professionals.

The Simberi Operations has a significant PNG national workforce with 53% of the local workforce based on the island of Simberi and surrounding local Tabar islands as well as a further 44% being other PNG nationals. Local employees are represented in all areas of the operation with the majority in roles such as heavy vehicle operators, processing technicians, camp and kitchen support and administration.



Simberi traditional dress

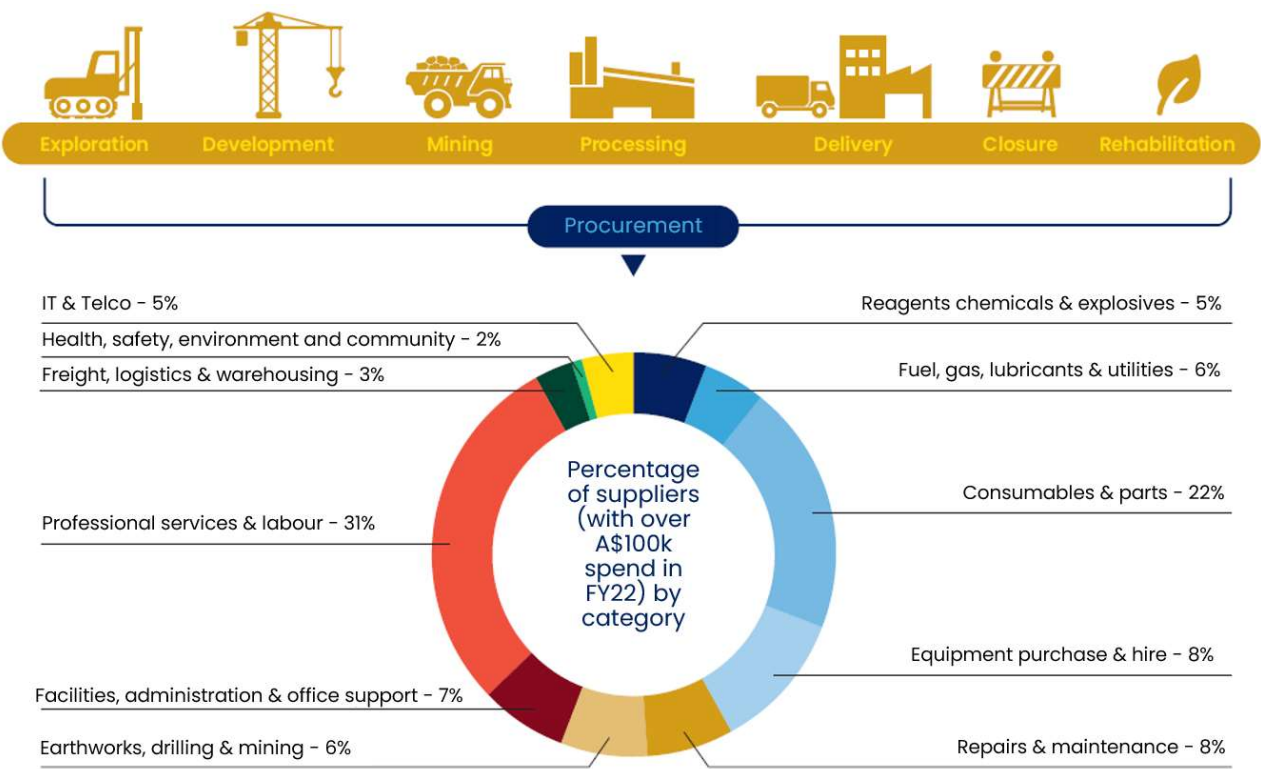
Our structure, operations and supply chains continued

Our supply chains

Our value chain and supply chain process is broadly described as follows: exploration, development, mining, processing, delivery to the mint and closure and rehabilitation.

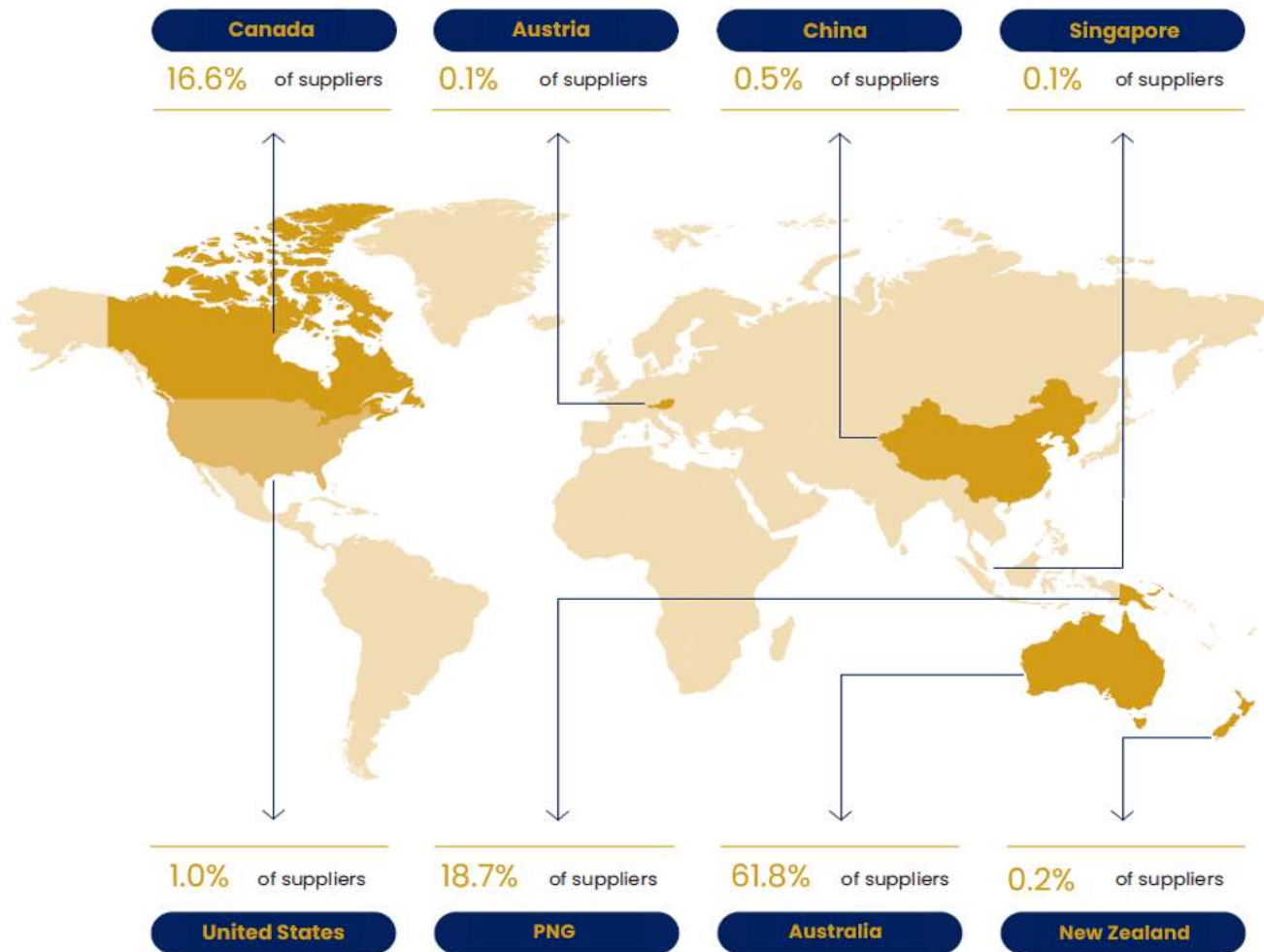
Our procurement function is responsible for providing support to our business to fulfil its operational requirements by employing effective procurement practices resulting in securing goods and services for our business, while providing commercial governance and management of our supply chain risks and opportunities.

A breakdown of our global FY22 material procurement supplier engagements, based on category, is set out in the diagram below:



Our structure, operations and supply chains continued

Our suppliers provide goods and services from around the globe. The results of our supplier questionnaire (discussed in further detail in this Statement), was issued to approximately 782 of our first tier or direct suppliers, representing approximately 98% of our overall spend. The results showed suppliers were domiciled predominately in Australia, PNG and Canada, reflecting the utilisation of local suppliers at our sites wherever possible. This is depicted in the following infographic of the St Barbara Group suppliers by location in FY22:



We recognise that a number of our suppliers supply goods that are either grown or manufactured in locations other than where those suppliers are domiciled. These countries include China, United Kingdom, India, Japan and the United States. Our focus has remained in this reporting period on our first-tier suppliers. However, we have included within our questionnaire the option to assist our suppliers to assess their supply chains. These are the first steps to building our capability to analyse the second tier of our supply chain.

Impact of covid-19

Covid-19 management

Since the World Health Organisation identified COVID-19 as a pandemic in March 2020, we have focused on ensuring the safety, health and wellbeing of our employees and their families, business partners and communities throughout this extended global crisis. The Board and executive management continue to acknowledge the extraordinary effort demonstrated by our people and our business partners in keeping each other safe whilst maintaining operations.

Under our Health and Safety Policy and related policies and standards – particularly the Critical Risk Control Standard – Infectious Diseases – we implemented the COVID-19 Management Framework. Through this framework and guidance, we have managed the health and safety aspects of the COVID-19 pandemic effectively.

A key priority in our management of COVID-19 is to decrease the likelihood that St Barbara's employees and contractors introduce the virus into the community. In FY22, supporting the rollout of the COVID-19 vaccine became a priority. St Barbara contributed to and initiated various measures to support our local and wider communities to cope with the medical, isolation-related, and economic impacts of COVID-19. Some of these initiatives included community outreach and volunteering. Other community programs planned or undertaken by the Group were suspended, delayed, or redirected due to COVID-19 restrictions.

We have included an overview (below) of the measures we maintained and adopted in FY22 as part of our response to the pandemic to convey the importance we placed on the wellbeing of the local communities in which we operate.

Atlantic

Nova Scotia continued to be impacted by COVID-19 in FY22, and the Atlantic Operations team found ways to offer support

throughout the year. The team took part in the packing of rapid antigen test kits for community distribution, ensuring a safe workplace through testing and isolation measures, and assisting employees to remain informed about COVID-19 vaccination. Atlantic Operations also supported local businesses, often the hardest hit by COVID-19, by giving employees vouchers at Christmas to be spent with these small retailers.

Leonora

While Leonora remained largely COVID free during FY21 due to lockdowns and Western Australia's isolation from the rest of the country, the town experienced different challenges in FY22. The Leonora Operations team were focused on supporting the vaccine rollout in Leonora, working with local and Aboriginal health services as well as sharing information about the vaccine on site. To reduce the risk of transmission when COVID-19 began to spread in WA, we halted all non-essential travel to Leonora and restricted our contact with the community. While this slowed progress of some initiatives, the need to prioritise the safety of the community was clear.

Simberi

Throughout FY22 at Simberi, our focus was largely on protecting the local community from infection and supporting vaccination efforts on the island. Simberi Operations maintained testing, quarantine, and isolation protocols to ensure that site itself remained safe. We also ran several vaccine rollout campaigns including education, community engagement, and provision of vaccines through visiting and Simberi Operations medical staff. As with Leonora, we also halted non-essential travel of our personnel into Simberi during significant outbreaks of the virus. Initiatives from the previous year including the provision of masks and handwashing facilities which helped to contain the spread of COVID-19 in FY22.



Covid testing Simberi

Risks of modern slavery

While St Barbara is not aware of any modern slavery in its operations and supply chains, we recognise the risk and is committed to improvement in how it manages it.

Introduction

Consistent with the UN Guiding Principles on Business and Human Rights, we assess the risk of modern slavery practices in our operations and supply chains by determining whether we have caused, contributed to or are directly linked to modern slavery. By way of brief explanation:

Cause	Contribute	Directly Linked
A company may cause modern slavery if its operations directly result in modern slavery practices	A company may contribute to modern slavery if, through its actions or omissions, it facilitates or incentivises modern slavery practises	A company may be directly linked to modern slavery practises through the activities of another entity that it has a business relationship with, such as a supplier of joint venture partner.
Example: This may include using forced or exploited labour at one of our sites.	Example: This may include engaging a service provider on terms that are so commercially favourable to the company that it may be reasonably inferred that the service provider is using forced or exploited labour.	Example: This may include engaging a supplier that uses forced labour as part of its own supply chain or manufacturing process.

Our operations

This section addresses the risks of modern slavery practices in our operations and the location specific processes in place to identify those risks. Each year we engage with our operations and review the outcomes of the EthixBase report to inform the focus of the coming year's activities.

We consider that our operational modern slavery risk remains low in respect of our Australian and Canadian Operations. Australia and Canada are ranked 163 and 166 respectively out of 167 countries for modern slavery prevalence by the Global Slavery Index. As a result of the low jurisdiction risk combined with our recruitment and remuneration programs, we consider that there is low risk of modern slavery practices in our Australian and Canadian operations.

The risk of causing, contributing or being directly linked to modern slavery is inherently higher in our Simberi Operations in PNG due to the combination of the country risk profile ranking of 21 out of 167 and the risk profile attributed to the mining sector.

For these reasons, in FY22 we remained focused on monitoring the modern slavery risk arising from our operation in Papua New Guinea.

We also carried out a business-wide Modern Slavery Risk Assessment to identify any new or emerging risks and corresponding actions to inform our FY23 actions.

Simberi – Risk factors detail

Local workers and our PNG supply chains continue to be our greatest exposure to modern slavery risks. PNG has a large proportion of the population living below the recognised poverty line. This is especially the case in regional isolated locations. However, labour conditions are often regulated by local customary systems – such as tribal and clan type organisations of mutual aid and reciprocity – making modern slavery (versus

simple poverty) less likely. Mining operations are typically supported by local communities due to the wealth of knowledge and infrastructure they bring to the locality.

Our 2009 benchmark study undertaken at the commencement of mining at Simberi, indicated the per household annual income was less than Kina 1,000 (US\$284). In 2017, the average household income had increased to over Kina 4,000 (US\$1,200).

We provide medical health care and basic infrastructure (roads, airport and wharf facilities) and contribute to education, other infrastructure (erosion control, water and sanitation) and services.

Mechanised mining operations typically employ “in demand” highly skilled staff, making modern slavery type conditions less likely. Approximately 44% of the workforce at Simberi is “in demand” high skilled or management employees from other parts of PNG. Different to local employees and contractors, there is strong competition for these services from other mines and the Oil and Gas industry. This group is typically well paid compared to local standards, flown to site and home on short rosters (approximately three weeks on, two weeks off), and housed in an accommodation camp.

The work performed by approximately 54% of the roles include heavy vehicle operators, process laborers, vegetation clearance, cleaners and cooks.

A key cause of large-scale immigration and a recognised modern slavery risk is artisanal mining. The Simberi gold ore type is not amenable to artisanal mining, reducing the attraction ‘pull’ to immigrants.

The lack of artisanal mining at Simberi is a key mitigating factor with respect to the reduced risk of modern slavery practices at our Simberi Operations in PNG.

Living costs, including food costs, can increase in the locality of mines, often because the local area can no longer support the

increased population or local farmers have become mine workers. There is some evidence this is the case at Simberi. A survey conducted for the 2019 Social Impact Study provided evidence that the population is reliant on imported foodstuffs. The importing companies are largely controlled by immigrants. Foodstuffs are typically sold at a premium compared to other parts of PNG due to the isolation of the Island and the scarcity of capital and networks for local business to set-up in competition with immigrants.

Child Labour

We recognise from the International Labour Organisation (ILO's) publication, *Child Labour in Mining And Global Supply Chains 2019*, that the mining sector can potentially cause child labour. However, we consider the risk is lower at Simberi, being a mechanised western-style mine with an ore deposit that does not support artisanal mining. The ILO notes that 'child labour in mining is most commonly found in artisanal and small-scale mines'¹.

Verifying the age of locals on Simberi Island remains challenging as birth certificates are almost non-existent. National ID Cards (NID) are challenging for locals to obtain, and the majority of locals do not have driver's licenses as they do not have vehicles. The NID application process is long and requires the applicant to leave site. Some have school certificates which can provide some indication as to the age of the individual, however, the certificates are not considered reliable in terms of validating age.

Further, there is also limited local awareness of the Lukautim Pikinini (Child) Act 2009 (No. 7 of 2009). The objective of this Act is to protect and promote the rights and wellbeing of all children regardless of gender and to protect children from all forms of violence, abuse, neglect, exploitation and discrimination, with a clear focus on services for prevention and strengthening the family unit.

In the absence of age verifying documentation, the contracting companies on Simberi Island that source contract workers for our Simberi Operations utilise visual checks to confirm working age. The workers sourced via these contracting companies are then required to undergo our own checks, as explained below.

Similarly, St Barbara's onsite Human Resources team use visual checks when new employees and contractors come in for employee photo identification. Employees are required to fill in the new starter form which requires a date of birth. We cross-check this information against the visual checks as a means of verifying age. Some locals have provided us with their "Clinic Book" which is the book that mothers are given when children are born on the island. We have undertaken networking with PNG and Australian based industry representatives for shared learnings. Some practices were highlighted e.g. localised census as part of the initial assessments.

Based on our records, which were reviewed in FY22, there is no one working on our mine site on Simberi Island under the age of 18 years. We remain vigilant on the risk of child labour and other forms of modern slavery that may form part of our Simberi Operations. In our ongoing efforts to improve on our ability to identify red flags, Simberi engaged with the PNG Resources

Industry Human Resources Network to share learnings with industry peers and determine whether any new methods were being used to support age verification.

Wages

In recognition of the fundamental human right to an adequate living wage, we assessed the wages paid to workers on Simberi Island and focused on the wages paid to the worker categories that were the lowest paid. We identified that assistants in our camps that undertake general cleaning duties in the mess and accommodation rooms and entry level roles in Geology and Environment are the lowest paid workers.

There is no set living wage in PNG. The only form of set wage is the national minimum wage, which was created by the Minimum Wages Board of Papua New Guinea in 2014 (which did not include automatic factoring for inflation and has not been updated since).

There has been no change to the national minimum wage in PNG K3.50 per hour. Based on our review, the:

- lowest hourly rate that we have paid for those with no relevant experience continues to be K3.60 per hour; and
- lowest annualised salary remains at K12,500 per annum plus superannuation for entry level positions and some assistant roles in Geology and Environment.

Over the last 12 months, there has been a total of 25 people promoted to a higher salary band in recognition of their increased skills through training and development whilst working at Simberi. One of those promotions included a local Simberi employee promoted to the role of Manager Community Relations

Again, in March this year, we participated in the annual Korn Ferry Salary Survey together with eleven other mining companies in PNG. Simberi Operations has participated in this survey for over seven years. We provide data according to levels of work, employee salaries at each level and in each specialist area (e.g. Maintenance, Human Resources, Finance etc.). The final results across all 11 participating companies gives us salary visibility for low, average and high remuneration bands for the various levels. Once this data is released, we update our remuneration benchmarking document which we use for all promotions, appointments of new employees, and through the salary increase and progression processes. This ensures fair, transparent and current remuneration based on experience and qualifications for a role.

In light of the above, we are satisfied that our workers on Simberi Island are paid in excess of the national minimum wage for PNG and are thus afforded an adequate living wage.

Living and Working Conditions

We acknowledge that everyone has a right to an adequate standard of living, including food and water as well as the right to safe and healthy working conditions. Inadequate living and working conditions can be a potential indicator of modern slavery.

¹ ILO, *Child Labour in Mining*, 2019,

https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_720743.pdf

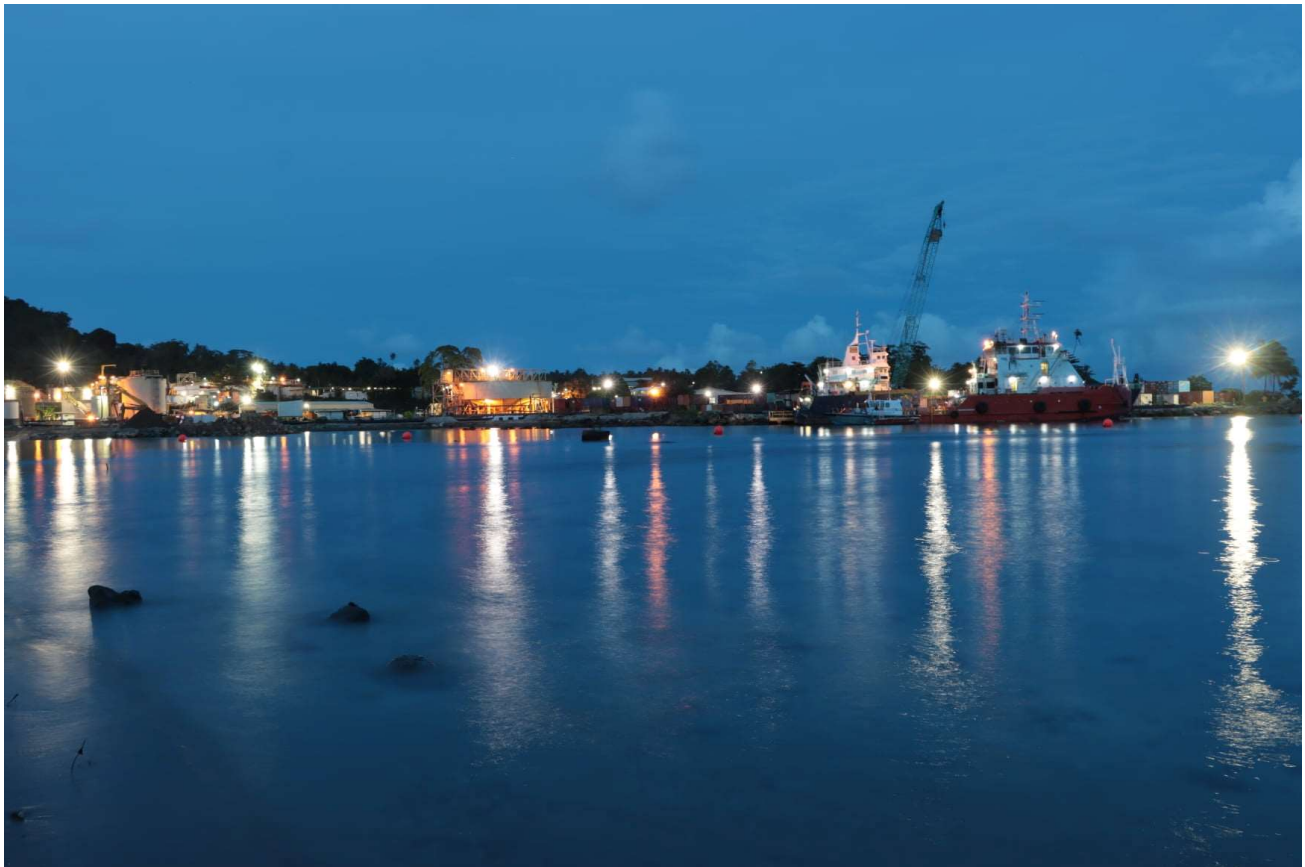
At our Simberi Operations, we provide camp accommodation, three meals per day, drinking water and amenities for those workers that fly into the island from other provinces of PNG for the purposes of work. This accommodation varies from single rooms with ensuite for more senior staff (Superintendent and Manager), to share rooms (with up to two employees in a room). The camp is maintained and cleaned daily by maintenance and cleaning personnel who are our direct employees.

Local employees on the mine site are provided with three meals per day and break periods.

All of our employees and contractors working on site receive appropriate Personal Protective Equipment including shirts, pants, work boots, hardhats and glasses, as required.

St Barbara plays a significant role in improving the living standards year on year for the locals living and working on Simberi Island. We conduct many civic-type functions, providing infrastructure and otherwise supporting health, law and order and education in the community. Our FY22 Sustainability Report sets out our recent community initiatives.

We are proud of the role we have played and continue to play in improving the living standards of the residents on Simberi Island and that of workers from other provinces of PNG.



Simberi port and facilities

Risks of modern slavery continued

Our supply chains

The section sets out the risks of modern slavery in our supply chain and the due diligence we have undertaken to assess and address those risks.

We continue to recognise that every supply chain carries the risk of causing, contributing or being directly linked to modern slavery. Given our industry sector, we are cognisant that the risks are inherently higher, particularly in PNG where the Global Slavery Index estimates that 81,000 people live in modern slavery. Having regard to the heightened risks we have, we continue to evaluate our supply chain for modern slavery impacts.

In the first reporting year (FY20), we reviewed our procurement spend across each of our operations and prepared a list of direct tier 1 suppliers based on an annualised spend of A\$25,000+. In FY21, we lowered the direct tier 1 supplier annualised spend threshold to A\$20,000 and maintained this threshold for FY22 (FY22 Due Diligence List). This List, comprising approximately 782 suppliers became our focal point for our supply chain review for modern slavery risk in FY22.

The UN's Guiding Principles on Business and Human Rights (Guiding Principles) articulates best practice in respect of human rights due diligence (which encompasses modern slavery). It includes four stages:

- Impact assessment
- Integration
- Tracking
- Communication

The UN's Guiding Principles recognises that prioritisation of risk is often essential for companies with extensive supply chains. We maintained the view that an online questionnaire-based approach was the most appropriate means by which to undertake our impact assessment. This would, in turn, determine our supply chain priorities in responding to modern slavery risk in our supply chains.

The suppliers on the FY22 Due Diligence List were issued a modern slavery questionnaire (MSQ) which was sent out via a third-party SAP cloud-based platform. The MSQ was designed with five key risk areas in mind:

- Jurisdiction/country of origin risk
- Industry/product risk
- Utilisation of vulnerable workers
- Prior human rights impact assessment
- Implementation of policies, procedures and systems

The MSQ features automated analytics that generates a modern slavery risk rating for each supplier based on responses to the weighted questions. The datasets underpinning the analytics are driven by global indices on modern slavery and human rights risks.

In FY22, as part of the MSQ communications with our suppliers, we continued to provide a link to our previous Modern Slavery

Statement to emphasise the importance we place on identifying and addressing modern slavery risks in our supply chains.

Despite efforts, we had a lower supplier completion rate of the MSQ in FY22 as compared to FY21. The completion rate was likely impacted by the absence of modern slavery legislation in Canada and PNG, and the repetitive nature of annual completion of the MSQ, for us and potentially other customers (so called 'questionnaire fatigue'). We continue to review how we can improve completion rates.

Of those that completed the MSQ in 2022, the proportion of suppliers that received high, medium and low risk ratings mirrored the breakdown from 2021. Almost 60% of the suppliers who responded to the questionnaire received a low-risk rating. The bulk of the suppliers in the low-risk category were in the professional, scientific and technical services industry in low-risk jurisdictions such as Australia and Canada, both of which have lower modern slavery risk profiles. This result was as anticipated. A sizeable proportion of suppliers operating in the mining or related industries (typically higher risk sectors) in Australia also came in as overall low risk, largely attributable to the presence of extensive policies and processes in place within those companies to mitigate modern slavery risks.

We took a closer look at the suppliers who were given a risk rating of medium and high based on the combination of jurisdiction and industry risks. The suppliers in the medium risk category were predominately in the mining, manufacturing and construction industries with some suppliers operating in higher risk jurisdictions. The combination of higher risk industries and jurisdiction were some of the main factors increasing the risk profile to medium. These risks were not automatically categorised as high risk due to suppliers having policies and processes in place to mitigate the risks.

During FY22, we identified three suppliers in the higher risk category as part of the MSQ process.

Two of the high-risk suppliers service our Leonora Operations. One is in the equipment hire/purchase services sector and the other is in the equipment maintenance sector. Both suppliers had limited policies and controls in place to address modern slavery risks, as well as operating in industries that have been identified as high-risk industries for modern slavery. In addition, both import goods made in higher risk jurisdictions of modern slavery.

The third supplier located in PNG; in the repair and maintenance industry was flagged as high risk in the questionnaire due to having very few human rights policies or training in place. However, after sourcing additional follow up reviews through our ESG Risk Management platform, this vendor has since been deemed low risk.

Our supply chain involves transportation and shipping of goods supplied to our sites and gold from the mine site to refineries. Depending on the nature of the goods supplied, either the supplier or we take responsibility for the shipping or freight. The transportation of gold from our mine operations is organised by third party refineries. We are cognisant that there have been reports of increased risks of modern slavery in shipping and

freight exacerbated by the COVID-19 pandemic. For example, seafarers working in the international shipping industry are said to have worked under poor living and working conditions, unable to leave the ship and return home for extended periods of time.

Noting the risk assessment conducted this year, the next section details our actions in managing those risks.



Directions for road transport deliveries to Leonora operation

Actions to assess and address risks

Building on the initiatives undertaken in FY21, we implemented a number of key initiatives this reporting period to identify, assess and address modern slavery risk in our global operations and supply chains. These included:

1. **Conduct targeted Modern Slavery Working Group sessions**
2. **Engagement and collaboration with external networks**
3. **Engagement with local Simberi stakeholder groups providing awareness**
4. **Continue to improve the due diligence completion rate of the FY22 MSQ responses**
5. **Interrogate the supply chain of high-risk suppliers**
6. **Conduct a risk assessment in relation to chartered shipping supply chain.**

1. Modern slavery training and workshops

We have a strong focus in educating and training our people. In FY20, we delivered modern slavery focused training to all Procurement and Human Resources personnel across all sites, as well as to all St Barbara managers (across all functions) and the St Barbara executive leadership team. In FY21, we developed and provided a modern slavery eLearning module for access by all employees across all our sites. The eLearning module covered topics such as:

- An overview of modern slavery
- Our reporting obligations under the Modern Slavery Act
- Types of modern slavery risk, including types of risks of modern slavery practices
- The steps we are taking to identify and assess modern slavery risk in our operations and supply chains
- How to report a known or suspected modern slavery risk, including within our grievous resolution framework

At the conclusion of the module, several multiple-choice questions were asked of the person receiving the training.

In FY22, we fulfilled our commitment providing site based in-person modern slavery workshops to the workforce in Simberi. The training materials were translated into the local language to increase compliance and reinforce understanding.

A local-language fact sheet including grievance information was also made available to attendees.

2. Industry and network collaboration

International Consulting Firm, Korn Ferry oversee a collective of PNG resources industry representatives who meet biannually regarding Human Resources operational matters including the annual salary survey. In FY22, St Barbara facilitated a modern slavery knowledge share session with this industry group. Topics covered included:

- Challenges and opportunities
- Age verification
- Grievance mechanisms
- Remedy examples

- Chartered shipping
- Other cultural implications

Learnings included exposure related to landowner businesses and their employees' conditions e.g., contract adherence including timely payment. Also raised was the opportunity to translate grievance and support mechanisms at key transport points e.g., jetties and wharves.

As part of our membership with the Minerals Council of Australia, St Barbara is a member Modern Slavery Taskforce. The Taskforce:

- Hosted a Modern Slavery webinar series – policy, practice, and emerging issues
- The MCA co-developed the Bribery Prevention Network
- Developed Modern Slavery Toolkit resources

St Barbara also became new member of the Human Rights Resources and Energy Collaborative (HRECC). HRECC is a group of Australian energy and resources companies that are collaborating to share knowledge and develop practical tools to identify and address modern slavery in supply chains. Walk Free, an initiative of the Minderoo Foundation is a human rights group working to accelerate the end of all forms of modern slavery and the HRECC developed the Response & Remedy Framework. . HRECC is a group of Australian energy and resources companies that are collaborating to share knowledge and develop practical tools to identify and address modern slavery in supply chains. The Framework is designed to provide guidance and practical steps for companies to assist their response to and remediation of any instances of modern slavery or related exploitation they identify they have caused, contributed or are directly linked to and to provide for, or cooperate in, remediation to harmed workers.

Other engagement included organisations such as Australian Catholic Anti-Slavery Network and Slavery Free Alliance and participation of the UN Global Compact Modern Slavery Community of Practice Implementing Stream.

3. Local communications, engagement, and materials

A communications plan was developed to raise awareness of modern slavery within the workforce on the island in PNG. The plan identified stakeholders and mechanisms for engagement. A fact

sheet was developed for the operations and translated into the local language to support communication efforts on Simberi.

In FY22, engagement was undertaken with several local groups such as local council, health centre, schoolteachers, women's group and topics included:

- St Barbara's policy and approach
- Grievance information
- Local and emerging issues

Positive feedback was received on St Barbara's Modern Slavery Policy and in particular that the company is taking the topic of inequality and injustice in the workplace seriously. The policy will help women and other organisations uphold better standards.

Learnings included our alignment with PNG legislation, greater understanding of the definition of child labour and increased awareness of our grievance process. Recommendation that the company should ensure other local companies are made aware of, are guided by and follow our policy. In response the fact sheet including grievance information was also provided to local stakeholders and suppliers.

4. Survey due diligence

Each year we review supplier categorisation and spend levels to determine the annual survey recipient list. We also analyse response rates to inform a data cleanse to reduce and remove generic addresses and undertake individual follow up. This is an ongoing exercise. Further we have refined the onboarding process to reduce likelihood of errors at point of entry.

A more detailed form for new suppliers was rolled out in FY22 to all sites across the business. The purpose of the new form was to gain additional information from suppliers to aid with initial due diligence in ensuring that we did not commence commercial arrangements with any business involved in any form of modern slavery.

Leonora Operations is a member of a group of mining procurement professionals who have developed the Goldfields Esperance Business Register that supports the engagement and support of local and regional vendors. Thus where possible reducing the reliance on interstate and international vendors.

To enhance local supplier responses at our Simberi Operations the annual survey is undertaken in a face-to-face interview.

5. Interrogation of high-risk suppliers

As part of FY22 commitments, three high-risk suppliers were identified across SBM supply chain as part of the FY21 MSQ. This included in Leonora, Western Australia, equipment hire and maintenance providers and landscaping providers direct to the Simberi Operations.

Regular and direct engagement, including a workshop, was conducted with the landscaping suppliers throughout FY22 including regarding delays to employee payments. In addition,

the supplier survey was undertaken in a face-to-face interview with additional questions regarding age and wage verification.

Due diligence was undertaken on the other two high-risk suppliers identified.

These investigations indicated suppliers' misinterpretation of questions regarding country of provision of their respective goods and services in high-risk countries versus country of manufacture and resulting answers had triggered a false positive result.

Using Maplecroft⁴ risk indices of country and industry risk, the identified false positive suppliers were also acting as distributors versus direct manufacturers of goods, thus taking a risk-based approach were identified as being high risk due to country of operation, but low risk due to industry risk.

Learnings:

- Establish a risk-based approach to prioritise highest and key risk suppliers and industries.
- Further data cleansing to support and ensure that the right question is being answered by the appropriate person within the supplier company which includes the future development of data acquisition of health, safety, environment and community or relevant sustainability personnel for greater, targeted engagement.
- Focus on direct suppliers versus indirect suppliers who act as distributors.
- Implementation of an escalation process to ensure greater involvement of Modern Slavery Working Group in operational remediations.

6. Shipping risk assessment

Our approach to direct shipping was reviewed in FY22. One PNG based supplier and coastal trader with vessels was flagged with 100% PNG crew. A deep dive with the supplier included a contractual compliance review of human rights related obligations as well as an inspection of the supplier's operating premises at port. The inspection covered:

- Worker age verification process;
- Worker conditions and facilities;
- Employment/Human Recourse Policies (which included vaccination requirements);
- Regular safety meetings;
- Use of other third parties;
- ABAC adherence; and
- Operation under (domestic) coastal service.

The deep dive and ship inspection helped inform the risk assessment with opportunities identified for FY23 with a focus on working with other PNG companies.

⁴<https://www.maplecroft.com/risk-indices/global-risk-dashboard-grid/>

Other initiatives

In addition to the initiatives implemented in FY22, the following details additional initiatives implemented to assist in identifying and addressing modern slavery risks in our operations and supply chains.

Modern Slavery Policy

Developed in FY20, the Modern Slavery Policy outlines our commitment to eliminate modern slavery within our global operations and supply chains. In FY22, we updated this Policy highlighting the following principles:

In relation to St Barbara's operations:	In relation to St Barbara's Supply Chain:
Ensure our personnel work for us voluntarily and are able to provide evidence that they are older than the minimum working age in the jurisdiction in which they work.	Ensure our personnel work for us voluntarily and are able to provide evidence that they are older than the minimum working age in the jurisdiction in which they work.
Remunerate our employees appropriately and in accordance with the minimum wage in the jurisdictions in which we operate	Require our suppliers to conduct regular due diligence of our supply chain to identify and address any actual or potential risks of modern slavery
Provide education and training to our employees on identifying indicators of modern slavery and assess our operations for modern slavery risk on an annual basis	Work with our personnel and affected persons (where appropriate) to provide effective remedies in the event we directly cause or contribute to modern slavery
Provide access to our whistleblower system to all relevant stakeholders including our employees and our suppliers	
Detail how modern slavery is assessed and addressed in our operations and supply chains	
Ensure all stakeholders involved with our business are equipped to report known or suspected cases of modern slavery, violations of this Policy, the Supplier Code of Conduct or other relevant ethical standards	

The Modern Slavery Policy supplements St Barbara's Code of Conduct and Supplier Code of Conduct, and is publicly available on our website at <https://stbarbara.com.au/our-company/governance/>

The Modern Slavery Policy forms part of our integrated suite of governance policies that together form our Code of Conduct.

Modern Slavery Working Group

A Modern Slavery Working Group was established in FY21. The Modern Slavery Working Group consists of members of the Procurement, Human Resources, Community and Social Responsibility, Legal and Risk functions of the St Barbara Group. The purpose of the Modern Slavery Working Group is to:

- Oversee the St Barbara Group's compliance with the Modern Slavery Policy and relevant modern slavery laws
- Support an integrated approach to addressing modern slavery risk
- Develop the content for the modern slavery annual statement
- Support the review and publication of the modern slavery annual statement
- Implement the commitments and actions arising from the modern slavery annual statement
- Monitor the Company's modern slavery performance
- Inform and advise the executive on modern slavery related matters and emerging issues

In FY22, membership of the Modern Slavery Working Group was expanded to include representation from our Simberi Operations, where we have the highest exposure.

Supplier Code of Conduct

Developed in FY20, the Supplier Code of Conduct sets out our business principles, based on our values. These business principles relate to:

- Modern slavery
- Anti-bribery and corruption
- Diversity and inclusion
- Health and safety
- Sustainability

We are committed to engaging with only those suppliers whose principles and practices match our own. Our suppliers are required to comply with all applicable laws and, in all cases, to meet the standards and principles set out in our Supplier Code of Conduct across all areas of their business.

The Supplier Code of Conduct requires our suppliers to comply with applicable modern slavery laws and expressly prohibits any forms of human trafficking, slavery, servitude, forced labour, forced marriage, deceptive recruiting for labour and services, debt bondage and child labour. We clearly state in our Supplier Code of Conduct that we reserve our right to undertake due diligence and risk assessments to verify supplier compliance.

These verification rights are supported by our standard contract terms and conditions.

We expect all of our suppliers to comply with the Supplier Code of Conduct. The Supplier Code of Conduct is publicly available on our website at stbarbara.com.au/contact/suppliers/

Modern Slavery Procedure

We are committed to maintaining high standards of ethics, integrity and statutory compliance. Modern slavery is one of our focus areas and our Modern Slavery Policy outlines our commitment to eliminating modern slavery within our global operations and supply chains. The Modern Slavery Procedure supplements the Modern Slavery Policy by outlining the processes in place to assist the St Barbara Group in identifying and addressing modern slavery in its global operations and supply chains.

Other policies and procedures

We updated a number of our policies and procedures in FY20 after undertaking a modern slavery gap analysis. This included updates to our Procurement Policy, Whistleblower Policy and Human Resources recruitment guidelines.

In FY22, we developed a Human Rights Policy to further support vulnerable people. It is publicly available on our website at stbarbara.com.au/our-company/governance/

Grievance process

In FY22, a concern was raised with management at the Simberi Operations in relation to worker rights. An investigation into the matter resolved the issue and we acted to ensure payment and the protection of worker rights (refer to case study page 19).

We are committed to providing, or cooperating in, remediation where we have identified that we – or our suppliers – have caused or contributed to modern slavery. In relation to our suppliers, remediation may include actions such as supplementary training, contract suspension, contract cessation and/or reporting to authorities.

If, hypothetically, we found that our business had caused or contributed to someone working for us as a modern slave, we would take guidance from the UNGPs, which provides that businesses in this situation need to remediate the impact by taking a person-centred approach protecting the safety, privacy and wellbeing of the affected person. We would undertake a full investigation of the situation to ensure that an appropriate

corrective action plan is implemented and assess how similar impacts could be avoided in the future.

The steps we take to help ensure grievance mechanisms are trusted and accessible, include providing details in corporate and local language fact sheets that are made available at our operations.

The high-level flow chart below indicates the process that St Barbara would undertake in the event we identified an instance of modern slavery in our operations or supply chains.

The Whistleblower Policy provides a mechanism whereby St Barbara employees, suppliers and others can report their concerns of actual or suspected misconduct, including modern slavery related breaches without the fear of reprisal or intimidation. All of our employees, contractors, consultants and suppliers have access to St Barbara's whistleblower system. Our whistleblower reporting service is managed by an external independent provider, where reports may be submitted by phone, on-line or by mail. In addition to this service, our employees may also report to their manager or designated Whistleblower Protection Officer.

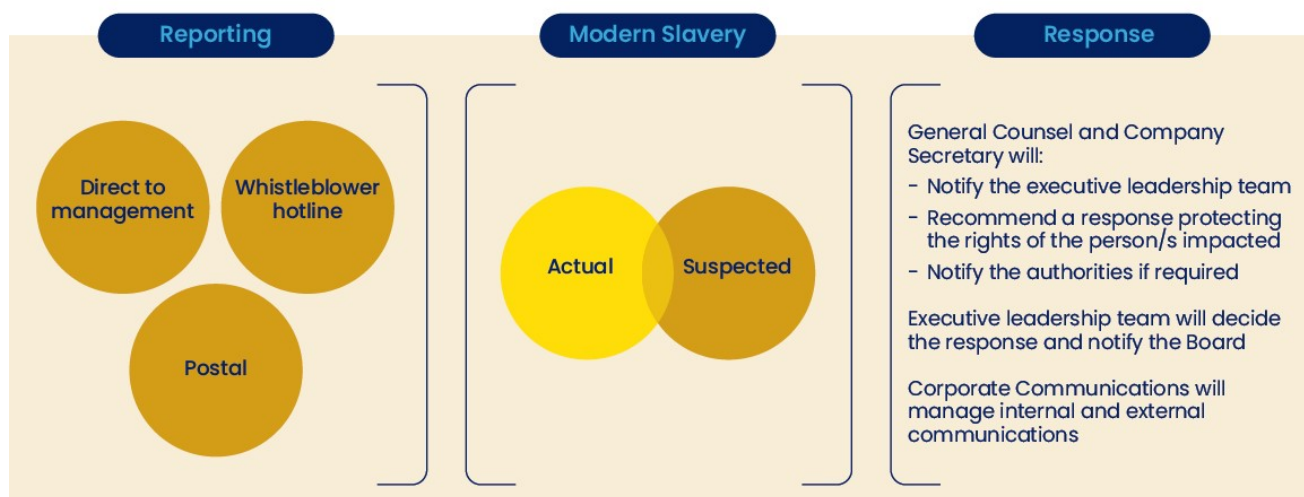
Further information regarding the whistleblower and investigation process is set out in the Whistleblower Policy, publicly available on our website at stbarbara.com.au/our-company/governance/

The St Barbara Grievance Procedure was updated in consideration of, and to provide additional guidance around Modern Slavery and Human Rights exposures. A site-based assessment and escalation process was also developed to support remediation activities.

Audits

St Barbara understands the value of auditing and conducts regular audits across a number of areas including finance, payroll, human resources, health, safety, and environment and community. As well as auditing occurring internally, such as regular management 'walk-arounds' and 'field observations' at our mine sites and gender pay audits maintaining our nil gender pay gap for like-for-like roles, some of our audits are conducted by third parties.

During FY22, a Gender Safety Audit was conducted at our Atlantic Operations as well as a Respectful Workplace Safety Audit at our



Leonora Operations. All findings inform site-based Action Plans, including Workplace Behaviour Training at all of our operations.

Engaging suppliers – onboarding

We understand the importance of early detection of modern slavery risk in our supply chains. Consequently, as part of the supplier onboarding process, we have sought to undertake a modern slavery risk assessment for all new suppliers to our business with an annualised spend of greater than A\$20,000 (in FY20 this was A\$25,000).

In addition, we updated our procurement tender process in FY20 by introducing modern slavery related considerations in our tender assessment criteria.

It is our policy not to engage with third parties where the minimum national and/or international legally required labour standards are not adhered to or where we believe, following a modern slavery risk assessment, that the third party or its suppliers engage in modern slavery (Minimum Standards).

We will not enter into or renew any contract with a third party whose risk of modern slavery is assessed as high without evidence that the third party has in place adequate controls to manage the risk of modern slavery.

More broadly, where the Minimum Standards have otherwise not been met, we will work with the supplier to help achieve, at the very least, the Minimum Standards prior to entering into any contractual arrangement. If the Minimum Standards are not met within a reasonable period, it is our policy to not engage with the supplier or terminate the existing engagement, as relevant, regardless of any short-term disruption to the supply chain.

Engaging suppliers – contracting

Where possible, we engage suppliers under our standard terms and conditions. These terms and conditions require our suppliers to meet a number of minimum standards, including with respect to:

- health and safety;
- environment;
- anti-bribery and anti-corruption; and
- modern slavery.

We expect our suppliers to meet these minimum standards. Where possible, we will endeavour to address modern slavery in all supplier engagements.

In FY22, the majority of the supply contracts entered into by the Group contained provisions addressing modern slavery obligations on the supplier.

Review of St Barbara's joint ventures and minority equity interest investments

We recognise that modern slavery may exist in the joint ventures we are associated with. Where we operate and manage a joint venture, we monitor and report on any modern slavery risk in that joint venture operation as part of St Barbara's operation. This is the approach taken with the Lake Wells Joint Venture.

Where we do not operate and manage the joint venture, we will assess modern slavery risk at a broader level. This includes annually requesting, from the operator, the processes and procedures the joint venture has in place to address modern slavery risk in its operations and supply chains. If we become aware of any material modern slavery risk in the joint venture, we will endeavour to address this risk with the joint venture operator. We have adopted this approach with the Drummartin Joint Venture, the Pinjin North Joint Venture and Pinjin South Earn-In and Joint Venture.

We also recognise that modern slavery may exist in the companies in which we invest, including companies that we have a minority equity interest. We have introduced modern slavery considerations as part of our due diligence process when assessing such investment opportunities. As a minority shareholder of Catalyst Metals Ltd, St Barbara made a request for information with respect to all of Catalyst's operations, which includes the Drummartin Joint Venture. Catalyst's response supports our continued opinion that there is a low risk of modern slavery practices associated with Catalysts' operations, including the Drummartin Joint Venture.

We will continue to engage in dialogue with Catalyst and our joint venture partners and seek ways to work collaboratively to increase awareness of modern slavery risks in the extractives industry.

Case study

During FY22, we received a letter from the employees of a Landowner Labour Hire company working at our Simberi Operations querying delays with their pay. An investigation was carried out which included financial records and engagement with both the Landowner Labour Hire company and its employees. While St Barbara had been paying the Landowner Labour Hire company appropriately, the company was experiencing financial challenges. St Barbara worked with the Landowner Labour Hire company, providing financial planning support and an agreed way forward. The employees received their pay entitlements. St Barbara continues to work with this company to build capacity and financial sustainability.

Measuring effectiveness

The evaluation of effectiveness is vital to ensuring that we are on the right track and effecting meaningful change.

We are committed to continually developing and improving the effectiveness of the actions we are taking to assess and address modern slavery risks.

One example is our monitoring of the modern slavery risk profile of our suppliers via the online automated MSQ process. The functionality of the MSQ process allows us to track our supplier's modern slavery risk profile each time it responds to the MSQ. Over time, this process will assist us in determining whether any actions we are taking with "higher risk" suppliers is effective in reducing such risk.

Another example of measuring effectiveness is in relation to our modern slavery training, including the eLearning module and embedded quiz. We maintain records of all those that attend training sessions as well as tracking the eLearning module completion rate and quiz accuracy by operation.

Performance Against FY22 action status

The table below outlines the status of actions for FY22 and associated status.

FY22 Actions (as set out in the FY 21 Modern Slavery Statement)	Status
1. Conduct targeted Modern Slavery working group sessions for relevant employees and contract owners	Three working group sessions
2. Engagement and collaboration with external networks to support education on modern slavery, enhance knowledge sharing and emerging practice.	Two knowledge sharing sessions
3. Engagement with local Simberi stakeholder groups providing awareness on modern slavery and grievances processes	Engagement with four local stakeholders/ groups
4. Continue to improve the due diligence completion rate of the FY22 MSQ responses	Ongoing
5. Interrogate the supply chain of engineering/industrial supply and landscape labour sectors into PNG and equipment hire/purchase sector into Leonora	Due Diligence on three high risk suppliers
6. Conduct a risk assessment on modern slavery risks in relation to chartered shipping supply chain	Risk assessment on chartered shipping supply chain

The following table highlights our commitment to continuous improvement and actions for FY23.

FY23 Commitments	Measure
1. Develop targeted modern slavery module for Simberi contract owners including remedy frameworks	Training module developed and positive feedback from attendees
2. Grievance process posted publicly in PNG and revised escalation process communicated	Two locations and all sites advised
3. Engage with PNG Landowner Businesses to improve survey data quality	Interview survey data improved
4. Review due diligence survey methodology	Improved response rate
5. Work with peers to review approach to auditing of PNG chartered shipping	Identification and collaboration with peers
6. Conduct a deep dive with key high-risk suppliers	Face to face interviews

Consultation with the group

In FY22 we strengthened our consultation process by establishing a Modern Slavery Working Group.

The Modern Slavery Working Group consists of members of the Procurement, Human Resources, Community and Social Responsibility, Legal and Risk functions of the St Barbara Group. The Modern Slavery Working Group meets on a regular basis, to oversee St Barbara Group's compliance with the Modern Slavery Policy and relevant modern slavery laws. The Modern Slavery Working Group informs and advises the executive on Modern Slavery related matters and emerging issues. The Executive Leadership Team (ELT) makes recommendations to the Safety and Sustainability Committee on any issues raised by the Sustainability Working Group.

The St Barbara Board is responsible for the oversight of all sustainability issues in the St Barbara Group. In FY22 the Board improved governance and assurance by elevating the Charter and accountability of the Safety and Sustainability Board Committee (formally the HSEC Committee). The Safety and Sustainability Board Committee has responsibility in ensuring modern slavery practices are identified and addressed in our operations. The Audit and Risk Board Committee are responsible for ensuring the proper management of human rights-related risks, including modern slavery.

In FY22, St Barbara had a centralised management function as follows:

- the procurement function of all locations ultimately reported to St Barbara's Head of Finance and Procurement;
- the human resources function for all locations reported to St Barbara's Head of People, Communications & Corporate Affairs;
- the majority of policies and procedures (including the Modern Slavery Policy and Procurement Policy) were applicable to all of our Operations;

- contract templates have been updated to include modern slavery clauses for all of our operations; and
- modern slavery eLearning module was developed and provided to the majority of our personnel for all of our operations.

The MSQ process was a joint effort across our locations in FY22, with site General Manager support. The procurement team worked collaboratively to formulate the FY22 Due Diligence List comprising suppliers from Australia, Canada and PNG. Significant support was provided by our Simberi Operations in conducting face-to-face interviews with local suppliers who were not able to access the computer based MSQ process. These suppliers were also provided St Barbara's Supplier Code of Conduct statement and Modern Slavery Policy in an educational brochure format.

Preparation of this Statement has involved consultation and input from all of the operating companies within the St Barbara Group, including Human Resources, HSEC, Procurement, Legal and the Modern Slavery Working Group.

The statement has been prepared with input from, and in consultation with, ELT and senior management representatives responsible for overseeing this work across the St Barbara Group (including our reporting entities).

The St Barbara executive leadership team has also reviewed this Statement before being submitted for Board approval.

For further information on our corporate governance practices, Board, Committees, and risk management and internal controls, please refer to our Corporate Governance Statement.



Board visit to Leonora core shed

Other information

External Engagement

St Barbara undertook external engagement with industry and not-for-profit organisations to share learnings and network with peers. This engagement included:

- Anti-Slavery task force - Networking meeting with Anti-Slavery task force to identify potential local partners.
- Minerals Council of Australia - Presenting in an industry webinar through the MCA to share learnings from our first year of Modern Slavery reporting with industry peers
- Other non-mining organisations - Participating in industry webinars to remain aware of best practices and learnings from other industries.
- PNG Resources Industry HR Network - Collaborating and engaging with industry representatives to share learnings regarding salaries and other local issues.

- Disclosure of our human rights and broader sustainability performance to proxy advisors through responses to their questionnaires and data checks.

Learnings identified via engagement are raised with the Modern Slavery Working Group for consideration in remedy, planning and reporting

In addition, community engagement is an important part of each of our operations and activities undertaken is outlined in our 2022 Sustainability Report <https://stbarbara.com.au/wp-content/uploads/2022/09/2022.09.16-asx-2022-sustainability-report.pdf>

Sustainability Accounting Standards Board (SASB)

St Barbara reports our alignment with the Sustainability Accounting Standards Board (SASB) Metals and Mining Standard. Below is an excerpt of relevant topics from this year's disclosure.



Topic	Accounting Metric	SBM alignment with Sustainability Report FY22 reference
Security, Human Rights and Rights of Indigenous Peoples	Percentage of (1) proved and (2) probable reserves in or near areas of conflict	1. 0% 2. 0%
	Percentage of (1) proved and (2) probable reserves in or near indigenous land	1. 100% – as per SASB definitions 2. 100% – as per SASB definitions
	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	Governance section
Community Relations	Discussion of process to manage risks and opportunities associated with community rights and interests	Various in Community section
	Number and duration of non-technical delays	1, 24 hours. Community section
Labour Relations	Percentage of active workforce covered under collective bargaining agreements, broken down by U.S. and foreign employees	11%. In Australia, approximately 1%, Papua New Guinea 0%, Canada 44%.
	Number and duration of strikes and lockouts	None
Workforce Health and Safety	(1) MSHA all-incidence rate, (2) fatality rate, (3) near miss frequency rate (NMFR) and (4) average hours of health, safety, and emergency response training for (a) full-time employees and (b) contract employees	All incidence rate = 16 x200,000/hours worked (5 million) = 0.68 Fatality rate = 1 x200,000/ hours worked (5 million) = 0 NMFR – not recorded Average hours of emergency training – not calculated
Business Ethics and Transparency	Description of the management system for prevention of corruption and bribery throughout the value chain	Supply chain www.stbarbara.com.au – Governance section.
	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	10%

United Nations Sustainable Development Goals (UNSDGs)

As part of our membership of the UN Global Compact, we support the UNSDGs. We have mapped our impacts against the most relevant Goals:

UNSDG (only most relevant goals)	Contribution	Self-assessment of impact
 <p>1 NO POVERTY</p>	<p>We contribute through the employment of people at high relative wages in:</p> <ul style="list-style-type: none"> a developing country, PNG a rural location in Nova Scotia, Canada, with relatively low employment rates, wages, and opportunities. <p>We pay our taxes, contribute to charities and, in PNG and Canada, engage local businesses.</p>	High
 <p>2 ZERO HUNGER</p>	<p>We provide financial and administrative support for the establishment of local enterprises, including for farmers near Simberi Operations, who sell food, other goods, and services to our mines and into the local economy. These revenues for local suppliers, as well as the wages earned by local employees, contribute to income streams that help combat food insecurity. We have also supported food banks in Nova Scotia and Western Australia.</p>	High
 <p>3 GOOD HEALTH AND WELL-BEING</p>	<p>We aim for zero harm to our employees and strive for improvement in our safety metrics year on year. We fund and run programs that support good health and wellbeing among employees and the community at our operations. In PNG, we provide free vaccinations to the community at our clinic, and where necessary roll out emergency vaccination programs.</p> <p>In Australia and Canada, we provide free flu vaccinations.</p> <p>In all three countries, we offer free mental health support to all employees through our Employee Assistance Program, which also provides a wide range of psychoeducation and support.</p>	Medium
 <p>4 QUALITY EDUCATION</p>	<p>In PNG, we support primary schools in the community and adult education for our employees and employees of contractors. This has included building new classrooms, houses for teachers, and donations of books and stationery.</p> <p>In Western Australia, we provide multi-year support to development and sports foundations that help Indigenous children in remote locations to attend school and achieve their goals.</p> <p>In Nova Scotia, Canada we support rural schools including through sponsorship of high school graduate awards, a high school theatre program, drives for school supplies, and taking on work experience students.</p>	Medium
 <p>5 GENDER EQUALITY</p>	<p>We are a global mining industry leader for gender equality, winning numerous awards for promoting and achieving high levels of women's employment, gender safety at work, domestic violence prevention, best-practice parental leave provisions and post parental leave return-to-work initiatives.</p> <p>We are major supporters of a women's wellbeing hub at Leonora, and we support a women in mining group at Simberi. We also conduct gender safety audits at Atlantic, Simberi and Leonora.</p>	High
 <p>6 CLEAN WATER AND SANITATION</p>	<p>None of our mines are in competition with domestic and agriculture water users.</p> <p>All three mines utilise recycling to minimise water use and costs.</p> <p>Our Leonora Operations in Western Australia has received government 'Waterwise' awards for reductions in water use in 2012, 2013 and 2020.</p>	Medium
 <p>7 AFFORDABLE AND CLEAN ENERGY</p>	<p>This year we began a pre-feasibility study to better understand a possible major renewable power installation at our Leonora Operations.</p> <p>At Atlantic Operations, Canada, we use saltwater batteries and solar panels to power our Touquoy site administration and ablutions facilities.</p>	Low

UNSDG (only most relevant goals)	Contribution	Self-assessment of impact
	<p>We strive to employ locally at our sites. At Simberi and Atlantic Operations, large proportions of our employees are from the immediate local area, or the region. We also contribute to economic growth by aiming to use and support local and regional businesses and suppliers (in PNG we frequently purchase from local landowner-owned businesses).</p> <p>We have growth projects at all three mines in the construction, planning or permitting stages. All employees and contractors are treated with respect and protected by a range of workplace policies. Our Papua New Guinea and Canada mines provide jobs at above average wages in those regions.</p>	High
	<p>At Leonora Operations in Western Australia, we have pioneered new developments in underground mining.</p> <p>At Simberi Operations in PNG, we build and maintain roads, water, education, and health infrastructure for our local communities.</p>	Medium
	<p>We have recently provided a work placement opportunity in Perth for a young person living with disability through our connection with Rise Network.</p> <p>We also acknowledge Diversity Matters Month, using the opportunity to celebrate the diversity backgrounds and lived experiences of our employees.</p> <p>One of our Executives chaired a series of MCA webinars on 'inclusive leadership', 'removing obstacles for employees with a disability in the mining industry' and 'increasing representation of Indigenous Australians in professional occupations in the mining industry'.</p>	Medium
	<p>We work to provide a sustainable future for the communities in which we operate during and beyond High mine life.</p> <p>At Simberi, we have provided seed funding and training to small businesses and have supported the establishment of cocoa plantations that will provide income well beyond the mine's life. We also contribute to the improvement and development of services on the island that will continue to serve the community.</p>	High
	<p>Thanks to innovative work by our Leonora Operations team, all of our Australian drill programs now use core trays made from 100% recycled plastic sourced in Australia.</p> <p>Our teams at each site are involved in community and site based recycling initiatives to reduce waste and raise awareness of the importance of recycling.</p>	Medium
	<p>We have a history of striving for relatively high GHG efficiency per ounce of gold produced. We have long-term targets in place to 2030 and 2050 to improve this efficiency further in line with Paris 2015 goals to achieve carbon neutrality by 2050.</p>	Medium
	<p>Our Simberi Operations are located on a small group of islands, and are naturally surrounded by a unique marine environment. Our Environment team at Simberi has a growing contingent of PADI certified divers who monitor our underwater activities, including ensuring the efficacy and safety of our DSTP. We also take part in coral propagation to support the island's reefs, and mangrove planting to maintain the shoreline environment.</p> <p>At our Atlantic Operations, we support a multi-year research project into the remediation of wetlands associated with historic gold mining.</p>	Medium
	<p>We undertake rehabilitation of disturbed land and management of waste and effluent according to Low regulatory requirements as well as provide offsets for unavoidable land and water harm to a higher standard of biodiversity.</p> <p>We prepare for closure in accordance with strict government requirements for forward financial provisioning.</p>	Low

UNSDG (only most relevant goals)	Contribution	Self-assessment of impact
16 PEACE, JUSTICE AND STRONG INSTITUTIONS 	<p>We have been a financial supporter of the EITI for five years and publish government taxation related information in our Sustainability Report.</p> <p>All political donations are prohibited under our governance policies.</p> <p>This year we published our first Human Rights Policy, and we publish an annual Modern Slavery Statement through which we determine actions to prevent and detect instances of modern slavery in our operations and supply chains.</p>	Medium
17 PARTNERSHIPS FOR THE GOALS 	<p>We value collaboration and connection with organisations both in our industry and outside of it. We hold membership with the Minerals Council of Australia (MCA), the Australian Resources and Energy Employers Association (AREEA) and the Mining Association of Canada (MAC). We are also members of the Diversity Council of Australia and the PNG Business Coalition for Women. Through these partnerships we take part in and contribute to communities of practice and other groups through which we are continually learning.</p> <p>Additionally, we collaborate with other organisations and communities to advance our commitment to tackling modern slavery.</p> <p>As part of our commitment to Stronger Communities, we support and partner with a range of community organisations who work toward achievement of the UNSDGs each day.</p>	Medium

Statement Annexure

	Mandatory criteria	Page number/s
a)	Identify the reporting entity	1 - 3
b)	Describe the reporting entity's structure, operations and supply chains	4 - 8
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	10 -14
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	16 -20
e)	Describe how the reporting entity assesses the effectiveness of these actions.	21
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	22
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant	23 - 25

Our values

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better

